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*Attorneys for Defendants United Parcel Service of America, Inc.,
United Parcel Service, Inc., and United Parcel Service Co.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
KEITH MURRAY,

Plaintiff,

-against-

UNITED PARCEL SERVICE OF AMERICA, INC.,
UNITED PARCEL SERVICE, INC., AND UNITED
PARCEL SERVICE CO.,

Defendants.
----- X

NO. 08-CV-02160 (LAK)

NOTICE OF MOTION

----- X
UNITED PARCEL SERVICE, INC.,

Third-Party Plaintiff,

-against-

JOSE BEATO,

Third-Party Defendant.
----- X

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support
of Motion for Leave to Amend Under Fed. R. Civ. P. 15(a), Declaration of Richard J. Rabin,

Esq., including the attachments thereto, and all prior pleadings and proceedings herein, the undersigned attorneys for Defendants United Parcel Service of America, Inc., United Parcel Service, Inc., and United Parcel Service Co., (collectively "UPS") will move this Court at such time as the Court designates, before the Honorable Lewis A. Kaplan, at the United States Courthouse located at 500 Pearl Street, New York, New York 10007 for an ORDER pursuant to Rule 15(a) of the Federal Rules of Civil Procedure granting UPS's motion for leave to amend its Answer.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 6.1(b) of the Local Rules of this Court, opposing memoranda shall be served upon the undersigned by July 23, 2008.

Dated: New York, New York
July 9, 2008

By: 

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X	
KEITH MURRAY,	:
	:
Plaintiff,	:
	:
-against-	:
	:
UNITED PARCEL SERVICE OF AMERICA, INC.,	:
UNITED PARCEL SERVICE, INC., UNITED	:
PARCEL SERVICE CO.,	:
	:
Defendants.	:
----- X	
----- X	
UNITED PARCEL SERVICE, INC.,	:
	:
Third-Party Plaintiff,	:
	:
-against-	:
	:
	:
JOSE BEATO,	:
	:
Third-Party Defendant.	:
	:
----- X	

CERTIFICATE OF SERVICE

I, Richard J. Rabin, hereby certify that on July 9, 2008, I caused true and correct copies of the following :

1. Notice of Motion
2. Declaration of Richard J. Rabin, Esq. and attached exhibits
3. Memorandum of Law on Behalf of Defendants' United Parcel Service of America, Inc., United Parcel Service, Inc., and United Parcel Service Co.

to be served via United Parcel Service Overnight Delivery upon the following:

Adam Richards

ADAM RICHARDS LLC
40 Fulton Street, 7th Floor
New York, New York 10038
Attorney for Plaintiff

Dated: New York, New York
July 9, 2008

By: 

Richard J. Rabin (RR-0037)
Evandro C. Gigante (EG-7402)
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